

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
EASTERN DIVISION  
FILE NO. 4:14 CV 151-D

TOWN OF BELHAVEN, NC; and	)	
THE NORTH CAROLINA NAACP	)	
STATE CONFERENCE OF BRANCHES,	)	
THE HYDE COUNTY NAACP BRANCH,	)	
and THE BEAUFORT COUNTY NAACP	)	<b>DEFENDANT PANTEGO CREEK, LLC's</b>
BRANCH,	)	<b>RESPONSE IN OPPOSITION TO</b>
	)	<b>PLAINTIFFS' MOTION TO REMAND</b>
Plaintiffs,	)	
	)	
vs.	)	
	)	
PANTEGO CREEK, LLC and	)	
VIDANT HEALTH, INC.,	)	
<u>Defendants.</u>	)	

NOW COMES Defendant Pantego Creek, LLC ("Pantego"), by and through undersigned counsel, and for the reasons stated in the Response in Opposition to Plaintiffs' Motion to Remand filed by co-Defendant University Health Systems of Eastern Carolina, Inc. d/b/a Vidant Health, Inc. [D.E. 32] hereby states its opposition to Plaintiffs' Motion to Remand [D. E. 27].

Respectfully submitted this the 10<sup>th</sup> day of November, 2014.

By: /s/Scott C. Hart  
State Bar No. 19060  
Attorneys for Pantego Creek, LLC  
Sumrell, Sugg, Carmichael, Hicks & Hart, P.A.  
Post Office Drawer 889  
New Bern, North Carolina 28563  
Telephone: (252) 633-3131  
E-mail: [shart@nclawyers.com](mailto:shart@nclawyers.com)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the **DEFENDANT PANTEGO CREEK, LLC's RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION TO REMAND** was electronically filed with the Clerk of Court using the CM/ECF System, and that I have mailed a copy by First-Class Mail, postage prepaid, to the following non-CM/ECF participants, addressed as follows:

Alan McSurely  
415 W. Patterson Place  
Chapel Hill, NC 27516

I further certify that the Clerk of Court using the CM/ECF System, will send notice of such filing to the following registered CM/ECF users:

John B. Tate III  
P.O. Box 700  
Chocowinity, NC 27817

Gary S. Qualls  
Susan Hackney  
Kathryn F. Taylor  
430 Davis Drive, Suite 400  
Morrisville, NC 27560

This the 10<sup>th</sup> day of November, 2014.

By: /s/Scott C. Hart  
State Bar No. 19060  
Attorneys for Pantego Creek, LLC  
Sumrell, Sugg, Carmichael, Hicks & Hart, P.A.  
Post Office Drawer 889  
New Bern, North Carolina 28563  
Telephone: (252) 633-3131  
Fax: (252) 633-3507  
E-mail: [shart@nclawyers.com](mailto:shart@nclawyers.com)

\\SERVER04\lssdocs\00000021\00055291.000.DOCX